

COVER SHEET

EXHIBIT YC

TESTIMONIES OF MARCEL B. MATLEY
AS AN EXAMINER OF DOCUMENTS AND HANDWRITING
FOR LAST FOUR YEARS

- Court testimony: Hearing on Motion to Suppress, February 19, 2004, *United States vs. Welch*, U.S. District Court for the District of Colorado, Denver, CO., Criminal Case No. 03-CR-452-MK, The Honorable Marcia S. Krieger, Judge presiding. Called by Defendant.
- Court testimony, February 24, 2004, I/M/O *Estate of Nancy M. Fisher, Fisher and Tell vs. Fisher*, Docket No. 135278, Superior Court of New Jersey, Chancery Division, Ocean County, Probate Part, The Honorable Marlene Lynch Ford, Judge presiding. Called by Plaintiffs.
- Deposition, March 09, 2004, *Garcia vs. Garcia*, Superior Court, Modesto, CA, Case Number 316642. Retained by Plaintiff.
- Court testimony: March 30, 2004, *INS/FDL Case Number 9801381*, Federal Immigration Court, San Francisco, CA, The Honorable Brian A. Simpson, Judge presiding. Called by Respondent.
- Court testimony: June 16, 2004, *Creditor's Trade Association, Inc., vs. Larman, et al.*, Case Number MCV 176180, The Honorable Knoell Owen, Judge presiding. Called by Plaintiff.
- Court testimony: June 22, 2004, *Ly vs. Hendricks, et al.*, Superior Court, San Francisco, CA, Case Number CUD-04-609990, The Honorable A James Robertson, II, Judge presiding. Called by Plaintiff.
- Deposition, August 24, 2004, *Garza vs. --*, San Francisco Superior Court, Case Number --. Retained by Respondent.
- Court testimony: August 25, 2004, *Estate of Raleigh A. Peppers*, Superior Court, Oakland, CA, Case Number --, The Honorable William A. McKinstry, Judge Presiding. Called by Petitioner.
- Court testimony: January 20, 2005, *Estate of Refugia Telles Garcia, Garcia vs. Garcia*, Superior Court, Modesto, CA, Case Nos. 335731, 316642, The Honorable John E. Griffin, Jr., Judge presiding. Called by Contestant.
- Court testimony: March 17, 2005, *Alfaro vs. Aragon, et al.*, Superior Court, Modesto, CA, Case No. 311351, The Honorable Roger M. Beauchesne, Judge presiding. Called by Plaintiff.
- Court testimony: June 08, 2005, *Orellana vs. Orellana*, Superior Court, Redwood City, CA, Case No. CIV 435508, The Honorable Carl W. Holm, Judge presiding. Called by Defendant.
- Deposition: August 22, 2005, *Proctor, et al., vs. Annavajjhala, et al.*, Dallas County, TX, Cause No. DV-03-07105-D. Retained by Plaintiff. Deposition taken in San Francisco, CA.

EXHIBIT YC: PAGE 1 OF 2 PAGES

- Court testimony: September 23, 2005, *Bereday and La Mirage, Inc., vs. Keehi Memorial Organization, et al.*, Circuit Court, First Circuit, Honolulu, HI, The Honorable Randal Lee, Judge presiding. Called by Plaintiff.
- Court testimony: September 30 and October 03, 2005, *U.S. vs. Serfing*, U.S. District Court, Northern District of Illinois, 03-cr-00300, The Honorable Matthew F. Kennelly, Judge presiding. Called by Defendant.
- Court testimony: December 06, 2005, in limine hearing, *People vs. Hamlin*, El Dorado County Superior Court, Placerville, CA, Case No. --, The Honorable Eddie T. Keller, Judge presiding. Called by Defendant.
- Court testimony: April 20, 2006, *INS/FDL Case Number A95-394-404, Respondent* [Identity confidential], Federal Immigration Court, San Francisco, CA, The Honorable Polly A. Webber, Judge presiding. Called by Respondent.
- Arbitration: *Williams vs. Haynes*, Bar Association of San Francisco, No. 06.003, June 16, 2006. Retained by Petitioner.
- *Gonzales vs. Burdg, et al.*, Superior Court, County of Stanislaus, Modesto, CA, Case Number 375050. Retained by Plaintiff.
 - Deposition: September 14, 2006.
 - Court testimony: October 24, 2006, the Honorable David G. Vander Wall, Judge presiding.
- Court testimony: October 03, 2006, *Kakkar vs. City Ventures, Inc., et al.*, Superior Court, Oakland, CA, The Honorable Gordon Baranco, Judge presiding.
- Court Testimony: November 02, 2006, *People vs. Shannon*, Superior Court, County of Stanislaus, Modesto, CA, Case Number (?), the Honorable John G. Whiteside, Judge presiding. Retained by Defendant.
- Court Testimony: December 11, 2006, *Devereaux vs. Clontz*. Superior Court, County of Santa Clara, San Jose, CA, Case Number CV 060715, the Honorable Mary Jo Levinger, Judge presiding. Retained by Plaintiff.
- Arbitration: January 9 and 10, 2007, *Levin vs. Gooch, et al.*, National Association of Security Dealers, New York, New York. Cross-examination continued to February 5, 2007. Retained by Plaintiff.
- Deposition: February 14, 2007, *Valencia vs. Sardinha, et al.*, Superior Court, County of Santa Clara, Case No. 1-06-CV-063147. Retained by Plaintiff.
- Arbitration: April 02, 2007, *4902 Kahala LLC, et al. vs. Sakatani, et al.; ILC-05-0019 GWBC*, Honolulu, HI. Retained by Plaintiff.

(04-24-07)

EXHIBIT YC: PAGE 2 OF 2 PAGES

COVER SHEET

EXHIBIT YD

A & M Matley***Examiner of Documents & Handwriting***

MARCEL B. MATLEY
 BOARD CERTIFIED, NADE
 PUBLICATIONS, SEMINARS
www.handwritingexpertsofcalifornia.com

(3092 ARMY STREET, 94110)
 POST OFFICE BOX 882401
 SAN FRANCISCO, CA 94188

PHONE: (415) 753-2832
 FAX: (415) 753-3346
 TOLL FREE: 1-800-367-8403
 E-MAIL: MMATLEY@AOL.COM

MARCEL B. MATLEY
EXAMINER OF QUESTIONED DOCUMENTS
FEES FOR SERVICES

BASIC FEE: \$175 per hour plus expenses, for new cases as of
 August 01, 2005.

\$350 non-refundable, initial retainer, for two-hour
 minimum.

\$50 per hour during required travel, plus costs.

TESTIMONY FOR ATTORNEY/CLIENT:

\$175 per hour, plus expenses.

DEPOSITIONS: \$175 per hour, with prepayment for expected time required.
 Unused balance to be refunded; excess charges to be
 invoiced.

TERMS: Responsible party is the law firm or individual attorney,
 unless specified otherwise.

Invoices payable net upon receipt. Unpaid amount subject to
 charge of 1.5% per month (18% APR.).

(09-11-06)

EXHIBIT YD

Regular type = On letterhead for that entity. Italic type = Indications are same person's signature. Square brackets [] = Signatory identified with other entity than association of document with the entity. X-A through X-F = Signatories whose names cannot be identified in documents examined.

ENTITY	Grant Brown	David A. Chalmers-Hunt	John H. Perkins	X-A	X-B	X-C (Melvyn Kalman)	X-D	X-E
PageCN Limited				CNL 01; CNL 02; CNL 03 [ET 05; ET 07; ET 10]	CNL 04; CNL 05; CNL 06 [ET 05; ET 07; ET 10]			CNL 02; C
Derard Limited				DL 01; DL 02; DL 03; DL 04; DL 05 [RL 07]	DL 01; DL 02; DL 03; DL 04; DL 05 [ET 04; ET 07]	DL 06; DL 07; DL 08; DL 09; DL 10 [ET 04; ET 06; ET 09]	[RL 07; RL 08]	
Equity Trust (ET)				ET 01; ET 02; ET 03	ET 04; ET 05; ET 06; ET 07; RT 09; ET 10	ET 04; ET 05; ET 06; ET 07; ET 08; ET 09; ET 10; ET 11		
Ryburn Limited (RL)	RL 07; RL 05 [DL 05; ET 03]	RL 05; RL 06	RL 01; RL 02; RL 03; RL 04	[DL 05; ET 09]	[DL 10; ET 09]	RL 05; RL 06	RL 07; RL 08	
Wesley Secretaries Limited (WSL)	WSL 02 [RL 05; RL 06]	WSL 01 (twice); WSL 02				WSL 01		
Crossgar Limited (CL)	[DL 01; DL 02]	[RL 06]		[DL 01; DL 02; ET 04; ET 06]	[DL 06; DL 07; ET 04]	[RL 06]		
Anvrin Holdings Limited (JHL)	[DL 03; DL 04]	[RL 06]		[DL 03; DL 04; ET 06]	[DL 08; DL 09; ET 06]	[RL 06]		

¹ that entity. Italic type = Indications are same person's signature. Square brackets [] = Signatory identified with other entity than that of letterhead or other with the entity. X-A through X-F = Signatories whose names cannot be identified in documents examined.

EXHIBIT X

1 HANA HILSENRATH
2 OLIVER HILSENRATH
3 822 Eastbrook Court
4 Danville, CA 94506
5 Telephone: 925 212 6299
6 Facsimile: 925 736 7571
7 ohlx@sbcglobal.net

8 PLAINTIFFS IN PRO PER

9

10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13

14 **HANA HILSENRATH AND OLIVER**
15 **HILSENRATH,**

16

17 **Plaintiffs,**

18

19 **v.**

20

21 **EQUITY TRUST (JERSEY) LIMITED,**
22 **CANDOVER INVESTMENTS PLC,**
23 **INSINGER DE BEAUFORT SA, JARDINE**
24 **MATHESON HOLDINGS LIMITED, GRANT**
25 **BROWN, MELVYN KALMAN, JOHN**
26 **PERKINS, CAROLINE BOUGEARD, AND**
27 **DOES 1-10,**

28

Defendants.

Case No.

EXHIBIT B:

CORRESPONDENCE BETWEEN NINE
EQUITY ENTITIES TO DEFEAT
FEDERAL COURT ORDER

20

21 Example of inner workings of the Equity Trust intricate corporate
22 network targeted to defeat a US Federal court order.

23

24 Nine fictitious letters from / and to / fictitious corporations
25 with:

26

- 27 • same anonymous signature,
- 28 • all on the same day,
- 29 • from and to the same address.

Derard Limited

Administration Office:

P O Box 546, 28-30 The Parade, St Helier, Jersey JE4 8XY, Channel Islands
Tel: +44 1534 636211 Fax: +44 1534 636215

11th April 2007

URGENT

CH Limited
P.O. Box 546
28-30 The Parade
St Helier
Jersey JE4 8XY
Channel Islands

Dear Sirs

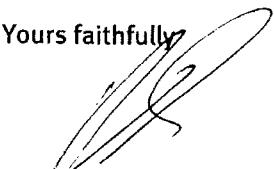
**Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited - v – Oliver Hilsenrath
Case No. CO2 1068CW**

We refer to our earlier correspondence with you in relation to the above matter.

Please find enclosed a copy of an Order, dated 29th March 2007, from the Federal Court in San Francisco. As set out in the Order, “...*a hearing on counterclaimants' motion for default judgment is set for Wednesday May 2, 2007, at 10.00am. in Courtroom G, 15th floor, Federal Building, San Francisco, California, 94102... Counterdefendants should attend the hearing if they contest the validity or amount of the claim*”.

We remind you that the situation stands as described in our earlier correspondence with you. Janvrin Holdings Limited is not in good standing and has been struck from the BVI Companies Register for non-payment of statutory fees. We have yet to receive funding from you for Janvrin Holdings Limited and look to you for instructions on whether or how to proceed in this matter. Absent hearing from you, we shall not take any further steps.

Yours faithfully,


For and on behalf of Derard Limited
Director of Janvrin Holdings Limited

Derard Limited

Administration Office:

P O Box 546, 28-30 The Parade, St Helier, Jersey JE4 8XY, Channel Islands
Tel: +44 1534 636211 Fax: +44 1534 636215

11th April 2007

URGENT

CN Limited
P.O. Box 546
28-30 The Parade
St Helier
Jersey JE4 8XY
Channel Islands

Dear Sirs

**Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited - v - Oliver Hilsenrath
Case No. CO2 1068CW**

We refer to our earlier correspondence with you in relation to the above matter.

Please find enclosed a copy of an Order, dated 29th March 2007, from the Federal Court in San Francisco. As set out in the Order, "...a hearing on counterclaimants' motion for default judgment is set for Wednesday May 2, 2007, at 10.00am. in Courtroom G, 15th floor, Federal Building, San Francisco, California, 94102...Counterdefendants should attend the hearing if they contest the validity or amount of the claim".

We remind you that the situation stands as described in our earlier correspondence with you. Janvrin Holdings Limited is not in good standing and has been struck from the BVI Companies Register for non-payment of statutory fees. We have yet to receive funding from you for Janvrin Holdings Limited and look to you for instructions on whether or how to proceed in this matter. Absent hearing from you, we shall not take any further steps.

Yours faithfully


For and on behalf of Derard Limited
Director of Janvrin Holdings Limited

Derard Limited

Administration Office:

P O Box 546, 28-30 The Parade, St Helier, Jersey JE4 8XY, Channel Islands
Tel: +44 1534 636211 Fax: +44 1534 636215

11th April 2007

URGENT

EQ Nominees (Jersey) Limited
P.O. Box 546
28-30 The Parade
St Helier
Jersey JE4 8XY
Channel Islands

Dear Sirs

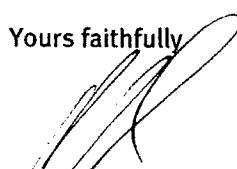
**Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited - v - Oliver Hilsenrath
Case No. CO2 1068CW**

We refer to our earlier correspondence with you in relation to the above matter.

Please find enclosed a copy of an Order, dated 29th March 2007, from the Federal Court in San Francisco. As set out in the Order, "...a hearing on counterclaimants' motion for default judgment is set for Wednesday May 2, 2007, at 10.00am. in Courtroom G, 15th floor, Federal Building, San Francisco, California, 94102... Counterdefendants should attend the hearing if they contest the validity or amount of the claim".

We remind you that the situation stands as described in our earlier correspondence with you. Crossgar Limited is not in good standing and has been struck from the BVI Companies Register for non-payment of statutory fees. We have yet to receive funding from you for Crossgar Limited and look to you for instructions on whether or how to proceed in this matter. Absent hearing from you, we shall not take any further steps.

Yours faithfully


For and on behalf of Derard Limited
Director of Crossgar Limited

Derard Limited

Administration Office:

P O Box 546, 28-30 The Parade, St Helier, Jersey JE4 8XY, Channel Islands
Tel: +44 1534 636211 Fax: +44 1534 636215

11th April 2007

URGENT

CN Limited
P.O. Box 546
28-30 The Parade
St Helier
Jersey JE4 8XY
Channel Islands

Dear Sirs

**Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited - v – Oliver Hilsenrath
Case No. CO2 1068CW**

We refer to our earlier correspondence with you in relation to the above matter.

Please find enclosed a copy of an Order, dated 29th March 2007, from the Federal Court in San Francisco. As set out in the Order, “...a hearing on counterclaimants’ motion for default judgment is set for Wednesday May 2, 2007, at 10.00am. in Courtroom G, 15th floor, Federal Building, San Francisco, California, 94102...Counterdefendants should attend the hearing if they contest the validity or amount of the claim”.

We remind you that the situation stands as described in our earlier correspondence with you. Crossgar Limited is not in good standing and has been struck from the BVI Companies Register for non-payment of statutory fees. We have yet to receive funding from you for Crossgar Limited and look to you for instructions on whether or how to proceed in this matter. Absent hearing from you, we shall not take any further steps.

Yours faithfully



For and on behalf of Derard Limited
Director of Crossgar Limited

Derard Limited

Administration Office:

P O Box 546, 28-30 The Parade, St Helier, Jersey JE4 8XY, Channel Islands
Tel: +44 1534 636211 Fax: +44 1534 636215

11th April 2007

URGENT

CN Limited
P.O. Box 546
28-30 The Parade
St Helier
Jersey JE4 8XY
Channel Islands

Dear Sirs

**Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited - v - Oliver Hilsenrath
Case No. CO2 1068CW**

We refer to our earlier correspondence with you in relation to the above matter.

Please find enclosed a copy of an Order, dated 29th March 2007, from the Federal Court in San Francisco. As set out in the Order, "...a hearing on counterclaimants' motion for default judgment is set for Wednesday May 2, 2007, at 10.00am. in Courtroom G, 15th floor, Federal Building, San Francisco, California, 94102... Counterdefendants should attend the hearing if they contest the validity or amount of the claim".

We remind you that the situation stands as described in our earlier correspondence with you. Ryburn Limited is not in good standing and has been struck from the BVI Companies Register for non-payment of statutory fees. We have yet to receive funding from you for Ryburn Limited and look to you for instructions on whether or how to proceed in this matter. Absent hearing from you, we shall not take any further steps.

Yours faithfully


For and on behalf of Derard Limited
Director of Ryburn Limited

Case 4:02-cv-01068 Document 278 Filed 03/29/2007 Page 1 of 3

1

2

3

4

5

6

7

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10

11 JANVRIN HOLDINGS LTD, et)
12 al.,)
13 Plaintiff(s),) No. C02-1068 CW (BZ)
14 v.)
15 DR. OLIVER HILSENRATH, et)
16 al.,)
17 Defendant(s).)
18 OLIVER HILSENRATH and HANA)
19 HILSENRATH,)
20 Counterclaimants,)
21 v.)
22 JANVRIN HOLDINGS LTD.,et)
23 al.,)
24 Counterdefendants.)
25)
26)
27)
28)

24 **IT IS HEREBY ORDERED** that pursuant to the Court's
25 discretion under Rule 55(b)(2) of the Federal Civil Rules of
26 Civil Procedure, a hearing on counterclaimants' motion for
27 default judgment is set for **Wednesday, May 2, 2007, at 10:00**
28 **a.m.** in Courtroom G, 15th Floor, Federal Building, San

Case 4:02-cv-01068 Document 278 Filed 03/29/2007 Page 2 of 3

1 Francisco, California, 94102.

2 Counterclaimants should be prepared to clarify the legal
3 bases for their claims. A threshold issue in awarding a
4 default judgment is determining whether the well pleaded
5 factual allegations of the counterclaim establish
6 counterdefendants liability on a valid legal claim. The
7 difficulty here is that the counterclaim contains more
8 conclusory allegations than factual allegations. For example,
9 the only named counterdefendants are Janvrin Holdings Limited,
10 Crossgar Limited, and Ryburn Limited. They are described as
11 shell companies held in a discretionary trust of which Equity
12 Trust is trustee. The trust document is not attached and
13 there is no factual explanation of what counterclaimants mean
14 by shell company or discretionary trust. The bulk of the
15 factual allegations in the counterclaim are directed against
16 Equity Trust, which is not named as a counterdefendant. The
17 counterclaim does not explain factually on what basis the
18 shell companies can be held liable for the acts of the trustee
19 and the papers filed in support of the motion for default
20 judgment do not explain as a matter of law why such liability
21 exists. Accordingly, the Hilsenraths should be prepared at
22 this hearing to explain what facts alleged in the counterclaim
23 establish each counterdefendant's liability.

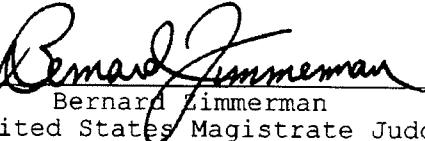
24 Counterclaimants should also be prepared to prove their
25 damages by competent testimony or other admissible evidence.
26 If they intend to prove damages by affidavits or declarations,
27 the affiant or declarant should have personal knowledge of all
28 matters to which she testifies. For all evidence, a proper

Case 4:02-cv-01068 Document 278 Filed 03/29/2007 Page 3 of 3

1 foundation must be established. For an explanation of the
2 evidentiary requirements for proving damages in a default
3 case, the parties are encouraged to consult Chapter Six of
4 *Civil Procedure Before Trial* by William W. Schwarzer, A.
5 Wallace Tashima, and James M. Wagstaffe.

6 Counterdefendants should attend the hearing if they
7 contest the validity or amount of the claim. Seven days
8 before the hearing, on **Wednesday, April 25, 2007**,
9 counterclaimants shall file a declaration setting forth in
10 detail all steps taken to serve counterdefendants with notice
11 of this hearing.

12 Dated: March 29, 2007

13 
14 Bernard Zimmerman
United States Magistrate Judge

15 G:\BZALL\REFS\HILSENRATH\ORDER.Sch.Hearing.wpd

16
17
18
19
20
21
22
23
24
25
26
27
28

C N Limited

P O Box 546, 28-30 The Parade, St Helier, Jersey JE4 8XY, Channel Islands
Tel: +44 1534 636211 Fax: +44 1534 636215

11th April 2007

Equity Trust (Jersey) Limited
Equity Trust House
PO Box 546
28-30 The Parade
St Helier
Jersey JE4 8XY

Dear Sirs

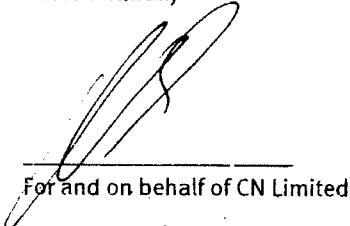
Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited – v- Oliver Hilsenrath
Case No. CO2 1068 CW

We are writing to you in your capacity of trustee of The Revenge Trust.

Please see the enclosed letter dated 11th April 2007 from Derard Limited, the Director of Crossgar Limited.

Please advise by return whether you are willing and able to furnish Crossgar Limited with the necessary funds. Absent hearing from you, we shall not take any further steps.

Yours faithfully



For and on behalf of CN Limited

C N Limited

P O Box 546, 28-30 The Parade, St Helier, Jersey JE4 8XY, Channel Islands
Tel: +44 1534 636211 Fax: +44 1534 636215

11th April 2007

Equity Trust (Jersey) Limited
Equity Trust House
PO Box 546
28-30 The Parade
St Helier
Jersey JE4 8XY

Dear Sirs

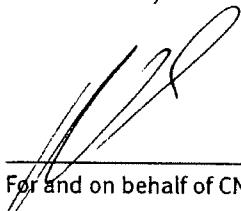
Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited – v- Oliver Hilsenrath
Case No. CO2 1068 CW

We are writing to you in your capacity of trustee of The Revenge Trust.

Please see the enclosed letter dated 11th April 2007 from Derard Limited, the Director of Ryburn Limited.

Please advise by return whether you are willing and able to furnish Ryburn Limited with the necessary funds. Absent hearing from you, we shall not take any further steps.

Yours faithfully


For and on behalf of CN Limited

C N Limited

P O Box 546, 28-30 The Parade, St Helier, Jersey JE4 8XY, Channel Islands
Tel: +44 1534 636211 Fax: +44 1534 636215

11th April 2007

Equity Trust (Jersey) Limited
Equity Trust House
PO Box 546
28-30 The Parade
St Helier
Jersey JE4 8XY

Dear Sirs

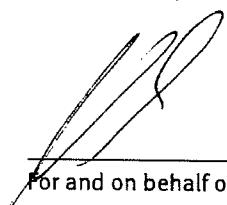
Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited – v- Oliver Hilsenrath
Case No. CO2 1068 CW

We are writing to you in your capacity of trustee of The Revenge Trust.

Please see the enclosed letter dated 11th April 2007 from Derard Limited, the Director of Janvrin Holdings Limited.

Please advise by return whether you are willing and able to furnish Janvrin Holdings Limited with the necessary funds. Absent hearing from you, we shall not take any further steps.

Yours faithfully



For and on behalf of CN Limited

EQUITY TRUST

Equity Trust (Jersey) Limited
Equity Trust House, P.O. Box 546
28-30 The Parade, St Helier, Jersey JE4 8XY
Channel Islands

David Dahan
24 Ivanova Dstreet
Apartment B
Kharkov
UKRAINE

Tel +44 (0) 1534 636211
Fax +44 (0) 1534 636215
Email infoje@equitytrust.com

And Via Email
dazid@isdn.net.il
davidadahan@gmail.com

St Helier, 11 April 2007

URGENT

Dear Sir

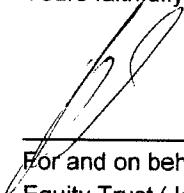
Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited -v- Oliver Hilsenrath – Case No. C02 1068 CW

We are writing to you in our capacity of trustee of The Revenge Trust.

Please see the enclosed letters dated 11 April 2007 from Derard Limited, the director of Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited and from CN Limited, a shareholder of Janvrin Holdings Limited, Crossgar Limited and Ryburn Limited.

Please advise by return whether you are willing and able to furnish Janvrin Holdings Limited, Crossgar Limited, Ryburn Limited and/or The Revenge Trust with the previously requested funds. Absent hearing from you, we shall not take any further steps.

Yours faithfully



For and on behalf of
Equity Trust (Jersey) Limited

1 John Perkins, Nixon's main co-conspirator in the theft of the
2 extortion-records stands a two days interview.

3
4 The interviewers were Ms. Laurel Beeler, for the US attorney
5 in San Francisco, and Mr. Bob Breakstone, for Oliver
6 Hilsenrath.

7 John Perkins was relaxed. He knew what everybody else was just
8 guessing in July 2005: He knew that Equity Trust and Nixon
9 Peabody had carefully destroyed all records leading to their
10 conspiracy to extort millions from Hilsenrath and US Wireless.

11 As the depositions were about documents supplied by Equity
12 Trust (Janvrin's owner) themselves, Perkins had nothing to
13 worry about: the traces of the conspiracy were lost forever in
14 the shredder and in the past.

15 Unbeknownst to Perkins, fortunately, part of the records of
16 the Janvrin-Nixon conspiracy were uncovered through other
17 sources.

18
19 Those documents were in the hands of the interviewers - Ms.
20 Beeler and Mr. Breakstone - both suspecting Perkins of a
21 cover-up.

22 At the end of two full days of Q&A, when the tiring process
23 was almost over, Breakstone asked him about the November 2000
24 meeting in London.

25
26 Perkins remembers. He was there, he remembers that Kalman was
27 there, Westreich was there, and Benzur was there.

1 Perkins remembers the subject being how to obtain more stock
2 from US Wireless - nothing else.

3
4 Breakstone asks Perkins "did you pass any personal information
5 about the Hilsenrath's assets at that meeting?"

6 Perkins, knowing that they thoroughly cleaned house, lied with
7 confidence: he does not recall passing Hilsenrath records.

8
9 Breakstone insists "did you pass any information about
10 Hilsenrath himself at the meeting".

11 Perkins has no reason to suspect and lies again confidently:
12 "that was not the subject of the meeting".

13 The package that Breakstone laid next in front of Perkins was
14 about to end Perkins's relaxed demeanor.

15
16 There were the private records stolen by Janvrin and Nixon
17 personnel from the Hilsenrath trust and transferred from
18 Jersey to the San Francisco office of Nixon Peabody by express
19 mail through a middleman: Amos Benzur from Israel.

20
21 The package, carefully shredded by the Janvrin/Nixon co-
22 conspirators in their offices, was there - intact.

23
24 Including tens of pages of records of assets of the
25 Hilsenraths.

26
27 Breakstone is patiently asking Perkins to review the package
28 and read page-by-page its contents into the televised and
transcribed record and to explain how those records ended up
in Benzur's and Westreich's hands - attorneys for Janvrin.

1

2 Only when Perkins's voice grew faint asking: "Do you want me
3 to keep going?" did Breakstone let him stop and asked him:

4

5 "What is going on here?"

6

7 Perkins incoherently explains: it was not him..., it was Kalman
8 (his superior at Equity) and he had no idea that this was the
9 subject at the 5 days' meeting (at which he participated on
his own recollection and at the recollection of 8 others).

10

11 Breakstone, unimpressed presses on and asks about Equity
12 Trust's integrity and fiduciary duty to the Hilsenrath's.

13

14 At that point, Viscount Substitute Matthews - the Jersey
15 presiding judiciary officer for the Queen - stood up and
16 stopped the proceedings to prevent Perkins from incriminating
17 his former employer Equity Trust (owners and operators of
Janvrin) and Nixon Peabody's co-conspirators.

18

19 This was the end of the depositions in Jersey.

20

21 A few months later the US attorney in San Francisco, through
22 diplomatic channels, sent an official letter to Ms. Rebecca
23 Boxall of the Jersey Attorney General asking why Equity Trust
24 (Janvrin owners) did not produce certain documents, pertinent
to that inquiry.

25

26 After numerous letters from the US to the Jersey authorities,
27 back and forth, and almost two years later, in April 2007 -
Equity trust ultimately admitted with resignation: we could
not locate those documents in our files.

1

2

3

4

5

6 **C2 - EXCERPTS/TRANSCRIPT OF INTERVIEW WITH PERKINS IN**
7 **JERSEY/UK, JULY-AUGUST 2005**

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 Q. And Dahan and Haruvi, they signed as CEO and
2 president of Pelican Securities & Investments and
3 Pelican Consulting; is that correct?

4 A. Yes.

5 Q. So apparently Matheson had been taking legal
6 action against one of its own clients since at least
7 2001; isn't that correct?

8 A. Yes.

9 Q. And through that entire time it was acting as a
10 trustee over Mr. Hilsenrath's trust; isn't that correct?

11 A. I believe that was the case, yes.

12 Q. How can that be?

13 A. Well, the only thing I would say is that -- and
14 again, it's not trying to pass the buck, but by that
15 time Mr. Kalman had taken primary responsibility for the
16 relationship. We'd indicated previously there was a
17 conflict of interest. And initially we, if you like,
18 came down on the side of continuing to act for Mr. Dahan
19 and Mr. Haruvi once realizing there was a conflict.

20 Q. And I think we've established that the attorney
21 representing the plaintiffs was Mr. Glen Westreich; is
22 that correct?

23 A. Yes.

24 Q. I think we've established that you met Mr. Glen
25 Westreich in early 2000 at a meeting in London, in which

1 yourself and certainly Mr. Kalman on the Matheson side
2 were present, and Mr. Dahan and Mr. Haruvi, they were
3 also present; isn't that right?

4 A. That's correct.

5 Q. And Mr. Hilsenrath did not attend that meeting.

6 A. He did not.

7 Q. Doesn't it appear that Insinger had a conflict
8 in that it was supporting legal action by some of its
9 clients against other of its clients?

10 A. The way I see it, we didn't have much choice in
11 the matter. We -- we were requested by clients to take
12 action. They -- they, I believe, gave us sufficient
13 proof that they -- that they had a litigious action to
14 bring, and so we -- because we administered the
15 companies on their behalf, which owned the shares which
16 were the subject of the dispute, under legal advice we
17 felt we had to proceed with the action.

18 Q. Did Matheson ever provide information to Dahan
19 or Haruvi or Westreich in relation to Oliver Hilsenrath
20 or any of his entities?

21 A. Well, that's quite a sweeping question, any
22 information. I don't think we gave -- I don't recall
23 giving specific information, such as has been referred
24 to before as in specific, you know, entire assets of
25 Aida Holdings. For example, I don't think we would have

1 discussed anything in detail.

2 Q. Was information about Oliver Hilsenrath
3 provided?

4 A. I don't recall any -- anything specific. I
5 don't really think that was the -- the subject of the
6 discussions. The discussion was either how to recover
7 stock or options or perhaps proceeds which Mr. Dahan and
8 Mr. Haruvi thought they were entitled to. So it was
9 really in that context.

10 Q. Were any records relating to Oliver Hilsenrath
11 or his entities provided to any of those who attended
12 the meeting?

13 A. Not to my recollection, no.

14 Q. Just off the record for a second.

15 Back on the record.

16 I hand you what has been previously marked as
17 Defense Exhibit 212, which appears to be a fax to Amos
18 Bentzur, B-e-n-t-z-u-r, Attorney at Law, from Linda
19 de la Cour, Insinger de Beaufort; the subject is Aida
20 Holdings, and the date is 6 November 2000.

21 A. Correct.

22 Q. What does this refer to? What attached -- what
23 attached documents are being provided to Mr. Amos
24 Bentzur?

25 A. It says it's going to fax the attached

1 documents in respect of the power of attorney in
2 relation to Aida Holdings Limited. And it goes on to
3 say that a courier package is being forwarded to
4 Mr. Bentzur in respect to the litigation. And attached
5 are documents relating to Telecom Associates, which are
6 from the Matheson or the Equity records, stating that
7 Mr. Hilsenrath is the client, and giving the registered
8 and administration addresses, details of the officers,
9 and giving the financial year-end. Just showing the
10 issued share capital, one share of Telecom Associates.

11 Then there's a -- internal ledger print showing
12 the various nominal accounts with some balances on.

13 It looks like similar information with respect
14 to Star Anise Limited. There's a Morgan Stanley Dean
15 Witter statement for the month ending 30th April 2000 in
16 regard to Star Anise, showing holdings and daily
17 activity.

18 There's some statements in relation to Borazon
19 Limited, showing basic company information and also
20 internal nominal ledger prints with balances on.

21 There's a statement for Borazon Limited, showing
22 relationships in regard to other entities, including
23 Aida Holdings Limited, showing the -- the bankers being
24 Matheson Bank International, and also brokerage accounts
25 with Morgan Stanley, Stuart Coleman, and Spear Leeds

1 Kellog.

2 Do you want me to keep going?

3 Q. No, that's all right.

4 Going back to the first page, Amos Bentzur,
5 wasn't he the attorney representing Dahan?

6 A. Well, he -- he was known to David Dahan and he
7 was certainly present at the meeting in London.

8 Q. So although the caption says it's Aida Holdings
9 Limited, and the paragraph that refers what's being
10 forwarded seems to indicate that "Kalman has asked me to
11 fax documents relating to a power of attorney on the
12 above company," would you agree with me that much of the
13 information that is being conveyed concern other
14 entities other than Aida Holdings?

15 A. Yes, it does.

16 Q. And also we have seen previously numerous --
17 numerous instructions from Mr. Hilsenrath to various
18 Matheson/Insinger trust people not to disclose
19 information to Mr. Dahan. Isn't that an accurate
20 statement?

21 A. Yes.

22 Q. What is going on here?

23 A. Well, all I can say is that I did not send that
24 fax, it was Linda de la Cour, and she sent it apparently
25 on the instructions of Mr. Melvyn Kalman. I don't

1 recall having seen any of this documentation before, so
2 I wasn't aware of it.

3 Q. You have worked in and on behalf of Matheson,
4 Insinger de Beaufort, and -- and Equity for how many
5 years, sir?

6 A. Sixteen and a half.

7 Q. You were aware of what the responsibilities and
8 fiduciary obligations are of trust companies --

9 A. Yes.

10 Q. -- isn't that correct?

11 Based upon your experience and your
12 professional dealings with many clients and trust
13 companies, do you believe that your employer had a
14 conflict of interest with Mr. Hilsenrath and breached
15 its fiduciary obligations as a result of the information
16 we have shown you here today?

17 VISCOUNT SUBSTITUTE MATTHEWS: Could I just
18 interrupt at this point. It seems to me -- I want to
19 find out the relevance of this in relation to these
20 particular criminal proceedings, and it seems to me that
21 you're asking this client to incriminate his former
22 employer.

23 MR. BREAKSTONE: I'll be happy to discuss this with
24 you, but it's not a relevant objection.

25 Mr. Dahan and Mr. Haruvi were primary investors